

COPY

FILED BY *[Signature]* D.C.

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

FILED *cas* D.C.

05 DEC 12 PM 3:56

2005 DEC 12 AM 9:05

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA,
Plaintiff.

VS.

CHAD JOHNSON,
Defendant.

MOTION GRANTED

Revert to
Thursday 12/22/2005
at 11:30 AM

[Signature]
JON PHIPPS McALLA
U.S. DISTRICT JUDGE

NOV 12, 2005
DATE NO. 05-20260-MI

MOTION TO CONTINUE SENTENCING HEARING

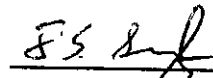
COMES NOW Defendant Chad Johnson, by and through his attorney of record Juni S. Ganguli, and respectfully moves this Honorable Court to continue the sentencing hearing in this case. In support thereof, counsel would show the following:

1. Mr. Johnson is set for sentencing on December 13, 2005. He is incarcerated.
2. Counsel has filed a position paper with the Court approximately ten days ago. Objections to the pre-sentence report are included in it.
3. Counsel has discussed this matter with Assistant United States Attorney Stephen Hall. Counsel recently has learned as to what the position of the United States will be if Defendant persists in his objections. Counsel has also learned what the government's position will be if the objections are withdrawn.

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4. Prior to possibly withdrawing his objections, Counsel wishes to research applicable caselaw in order to properly advise Mr. Johnson as to his options.
5. Assistant United States Attorney Stephen Hall has no opposition to this request.

Respectfully submitted,



Juni S. Ganguli (TN 018659)
Attorney for Defendant
40 South Main Street, Suite 1540
Memphis, TN 38103
(901) 544-9339

CERTIFICATE OF SERVICE

I, Juni S. Ganguli, attorney for Defendant, do hereby certify that a copy of the foregoing document has been forwarded to Assistant United States Attorney Stephen Hall, Office of the United States Attorney, 167 North Main Street, Suite 800, Memphis, Tennessee, on the 12th day of December, 2005.



Juni S. Ganguli



Notice of Distribution

This notice confirms a copy of the document docketed as number 24 in case 2:05-CR-20260 was distributed by fax, mail, or direct printing on December 13, 2005 to the parties listed.

Juni S. Ganguli
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Stephen P. Hall
U.S. ATTORNEY'S OFFICE
167 N. Main St.
Ste. 800
Memphis, TN 38103

Honorable Jon McCalla
US DISTRICT COURT